

**South Coast AQMD Executive Officer Wayne Nastri's
Testimony Delivered During U.S. EPA's Control of Air
Pollution from New Motor Vehicles: Heavy-Duty Engine
and Vehicle Standards Virtual Public Hearing.**

April 12, 2022

Good morning. I am Wayne Nastri, Executive Officer for the South Coast Air Quality Management District. We are the local agency responsible for air quality in the greater Los Angeles area.

Over 17 million people reside in the South Coast Air Basin, breathing some of the most polluted air in the nation. We fail to meet multiple federal air quality standards and face hard deadlines to meet ozone standards in the short term.

We estimate that the air pollution our residents face causes 1,600 premature deaths a year, along with thousands of excess emergency room visits and hundreds of excess hospital admissions annually.

NOx is the primary pollutant that must be controlled in our region to reduce ozone. Heavy-duty trucks are currently our top source of NOx.

We project that we need a 45% reduction in NOx emissions beyond existing regulations by 2023, a 55% reduction by 2031, and a 73% reduction by 2037 – truly a breathtaking amount.

As a local air agency, we have limited authority to control truck emissions – that authority instead falls squarely on EPA and CARB.

While CARB has taken action to address truck NOx emissions through their Omnibus regulation, that regulation does not reach the trucks that come into California from out of state.

We believe we will not meet the clean air standards absent significant federal action. And the truth of the matter is South Coast is not alone.

EPA actions are needed to help a significant number of other areas across the nation that are either in non-attainment or quickly going into non-attainment for ozone.

The body of evidence supporting a lower standard has only grown since 2016 when we petitioned EPA for a new truck rule.

Our preference therefore is for EPA to finalize a rule in line with the Alternative approach that includes a 0.02 g/bhp-hr standard that is outlined in the proposal.

This approach provides earlier and greater emission reductions than the two options in the proposal in a shorter timeframe.

This will help deliver cleaner air sooner to communities throughout our air Basin and the nation.

We are concerned, however, that the Alternative approach may take additional time to finalize as EPA is requesting more data to support it. A revised standard is needed as soon as possible and our paramount concern is that EPA finalizes the standard by the end of this year.

If EPA's pursuit of the Alternative approach would jeopardize that timeline, we would instead support Option 1. Option 1 is not ideal as it allows for more emissions than adoption of a standard equivalent to

CARB's regulation, especially in the early years of the program.

We are also concerned that the flexibilities built into Option 1 could result in a strong standard on paper that is in reality watered-down, and caution EPA to be mindful of that potential outcome.

As an example, allowing manufacturers to generate NOx credits from sales of zero-emission engines could disincentivize investments in clean technologies for internal combustion engines delaying needed emission reductions.

In closing, we urge EPA to finalize a rule that prioritizes achieving maximum emission reductions as soon as feasible.

Thank you.